



monsterworldwide



LETTER OF COMMENT NO. 126

January 4, 2007

Mr. Robert H. Herz  
Chairman, Financial Accounting Standards Board  
401 Merrit 7  
P.O. Box 5116  
Norwalk Ct 068516-5116

Dear Chairman Herz:

On behalf of Monster Worldwide Inc, I strongly urge the Financial Accounting Standards Board to delay the effective date of FIN 48 on *Accounting for Uncertainty in Income Taxes* to allow companies sufficient time to address the substantive, procedural, and documentation challenges posed by the new interpretation. Specifically, I recommend that the effective date of FIN 48 be deferred to fiscal years beginning after December 15, 2007. The challenges of implementing FIN 48 were articulated by Tax Executives Institute ("TEI") in a letter it sent to you on December 12, 2006.

Speaking from my own personal experience in implementing FIN 48 we are finding that both our auditors and the consulting firms assisting us with the implementation are reading FIN 48 to mean that we must effectively conduct a detailed "self tax audit" of *all* of our tax positions in every tax jurisdiction for *all* open years (which is generally three years). The information request lists and work plans given to us by the consultants are similar to those provided by government tax auditors, and in most cases go beyond what most government tax auditors ask to see. Can you possibly fathom *any* tax audit of a large multinational company being completed in a period of less than a year for one jurisdiction, let alone *every* jurisdiction (federal, state and international) in which we are filing and those in which we should be filing, for *all* open years, and *all being conducted concurrently* ?? Even with outside help from consultants, the mere task of properly managing so many diverse tax jurisdictions and tax issues is daunting, let alone dealing with the uncertain interpretational and implementation issues outlined in the TEI letter.

In addition our company, like many other internet and high-tech companies, has a history of tax net operating losses carrying forward from years that are otherwise closed to audit. Under FIN 48, since these losses are being carried to open tax years and are technically open to review, we must apply the same "self-audit" process to the tax returns originating these old losses in order to be compliant with FIN 48. Some of these losses go back as far as 10 years. Without additional implementation guidance and time to consider the rules, there will be significant diversity in practice for companies in similar situations.

In summary, extending the deadline for implementing FIN 48 will permit companies and their independent auditors to resolve unanswered questions and thus reduce the likelihood of diversity in practice, which in part prompted the development of FIN 48 in the first instance.

Respectfully,

  
Raymond Zaniewski  
Director, Tax reporting  
Monster Worldwide Inc